

JAY EDELSON (Admitted *Pro Hac Vice*)
jedelson@edelson.com
RAFEY S. BALABANIAN (Admitted *Pro Hac Vice*)
rbalabanian@edelson.com
BENJAMIN H. RICHMAN (Admitted *Pro Hac Vice*)
brichman@edelson.com
CHANDLER R. GIVENS (Admitted *Pro Hac Vice*)
cgivens@edelson.com
EDELSON LLC
350 North LaSalle, Suite 1300
Chicago, Illinois 60654
Telephone: (312) 589-6370
Facsimile: (312) 589-6378

Attorneys for Plaintiff and the Putative Classes

RICHARD M. WILLIAMS (SBN 68032)
rwilliams@grayduffy.com
GRAY DUFFY LLP
702 Marshall Street, Suite 600
Redwood City, California 94063
Telephone: (650) 365-7343
Facsimile: (650) 365-6225

Attorneys for Defendant SpeedyPC Software

[Additional counsel included below.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROSE-MAI ROBICHAUD, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SPEEDYPC SOFTWARE, a British
Columbia company,

Defendant.

Case No. 3:12-cv-04730-LB

**STIPULATION OF DISMISSAL
PURSUANT TO FED. R. CIV. P. 41**

Judge: Honorable Laurel Beeler

Action Filed: September 11, 2012

1 Plaintiff Rose-Mai Robichaud and Defendant SpeedyPC Software (collectively, the
2 “Parties”), hereby stipulate and agree pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) to
3 the dismissal of Plaintiff’s individual claims against Defendant in this action, with prejudice. In
4 support of the instant stipulation, the Parties state as follows:

5 **WHEREAS**, on December 11, 2012, Plaintiff filed her First Amended Class Action
6 Complaint against Defendant;

7 **WHEREAS**, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parties may stipulate to the
8 dismissal of this action without a Court order;

9 **WHEREAS**, the Parties have conferred and agreed to stipulate to the dismissal of Plaintiff’s
10 individual claims against the Defendant in this action with prejudice;

11 **WHEREAS**, the Parties have further agreed that they shall each bear their own attorneys’
12 fees and expenses incurred in any way related to the litigation of this action;

13 **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby
14 **STIPULATE** and **AGREE** as follows:

15 1. Plaintiff Robichaud’s individual claims against Defendant in this action shall be
16 dismissed with prejudice; and

17 2. The Parties shall each bear their own attorneys’ fees and expenses incurred in any
18 way related to the litigation of this action.

19 **IT IS SO STIPULATED.**

20 Respectfully submitted,

21 **ROSE-MAI ROBICHAUD**, individually and on
22 behalf of all others similarly situated,

23 Dated: May 2, 2013

By: /s/ Benjamin H. Richman
One of Plaintiff’s Attorneys

24 JAY EDELSON (Admitted *Pro Hac Vice*)
jedelson@edelson.com

25 RAFEY S. BALABANIAN (Admitted *Pro Hac Vice*)
rbalabanian@edelson.com

26 BENJAMIN H. RICHMAN (Admitted *Pro Hac Vice*)
brichman@edelson.com
27
28

CHANDLER R. GIVENS (Admitted *Pro Hac Vice*)
cgivens@edelson.com
EDELSON LLC
350 North LaSalle, Suite 1300
Chicago, Illinois 60654
Telephone: (312) 589-6370
Facsimile: (312) 589-6378

SEAN P. REIS (SBN 184044)
sreis@edelson.com
30021 Tomas Street, Suite 300
Rancho Santa Margarita, California 92688
Telephone: (949) 459-2124
Facsimile: (949) 459-2123

Attorneys for Plaintiff and the Putative Classes

SPEEDYPC SOFTWARE,

Dated: May 2, 2013

By: /s/ Richard M. Williams
One of Defendant's Attorneys

RICHARD M. WILLIAMS (SBN 68032)
rwilliams@grayduffylaw.com
GRAY DUFFY LLP
702 Marshall Street, Suite 600
Redwood City, California 94063
Telephone: (650) 365-7343
Facsimile: (650) 365-6225

Attorneys for Defendant SpeedyPC Software

CERTIFICATE OF SERVICE

I, Benjamin H. Richman, an attorney, hereby certify that on May 2, 2013, I served the above and foregoing ***Stipulation of Dismissal Pursuant to Fed. R. Civ. P. 41***, by causing a true and accurate copy of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system on this 2nd day of May 2013.

/s/ Benjamin H. Richman